



**LOCAL PLAN PUBLICATION STAGE REPRESENTATION FORM**

**North Hertfordshire Proposed Submission Local Plan**

Please return this form to North Hertfordshire District Council either by email to : [local.plans@north-herts.gov.uk](mailto:local.plans@north-herts.gov.uk) or by post to: Strategic Planning and Projects Group, NHDC, PO Box 480, M33 0DE

The deadline for receipt of representations is **30 November 2016**. Late representations will not be considered.

*This form has two parts-*

**Part A** – Personal Details

**Part B** – Your Representation(s). Please fill in a separate sheet for each representation you wish to make.

**Part A**

**1. Personal Details**

**2. Agent Details**

*\*If an agent is appointed, please complete only the Title, Name and organisation boxes below but complete the full contact details the agent in 2.*

Title	<input type="text"/>	Mrs
First Name	R	Hayley
Last Name	Daniels	Doyle
Job Title <i>(Where relevant)</i>	<input type="text"/>	Director
Organisation <i>(Where relevant)</i>	<input type="text"/>	hd planning ltd
Address Line 1	c/o agent	3 Stevenson Court
Line 2	<input type="text"/>	Eaton Ford
Line3	<input type="text"/>	St. Neots
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text"/>	PE19 7LF
Telephone Number	<input type="text"/>	07916 276 436
Email Address <i>(Where relevant)</i>	<input type="text"/>	hayley@hdplanning.co.uk

**Part B - Please use a separate sheet for each representation**

It is recommended that you read the Guidance Notes provided for an explanation of the terms used in this form.

**Name or Organisation:**

3. To which part of the Local Plan does this representation relate?

Paragraph(s)  Policy  Site

4. Do you Consider the Local Plan is:

*(Please tick as appropriate)*

i) Legally Compliant	Yes	<input type="text" value="X"/>	No	<input type="text"/>
ii) Sound	Yes	<input type="text"/>	No	<input type="text" value="X"/>

If No, which of the Soundness tests does it fail?

Positively prepared	<input type="text"/>
Justified	<input type="text" value="X"/>
Effective	<input type="text" value="X"/>
Consistent with National Policy	<input type="text"/>
iii) Complies with the Duty to co-operate	Yes <input type="text" value="X"/> No <input type="text"/>

5. Please give details of why you consider the Local Plan not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Site HT2, in the proposed submission draft, has been allocated for 84 homes to assist with creating 1,009 new dwellings (from allocations) in Hitchin. The justification for the site's allocation appears to have been supported by the landscape study undertaken from 2012 which shows this specific area of land as "less sensitive". In addition to this, the Site Assessment Matrix in 2014 discounts some of the alternative sites within the same area on the edge of Hitchin and this is echoed within the Strategic Land Availability Assessments (SHLAA) between 2014- 2016. These similar sites have been dismissed despite scoring similar to site HT2 within the Planning Constraints Matrix (2014). We wish to revisit this justification and submit an alternative site which we believe is as, if not more, suitable to offer additional dwellings whilst also protecting the landscape of the area and improving some highways routes.



This Landscape Sensitivity Study, carried out by Landscape Use Consultants Ltd in 2012 was commissioned by North Hertfordshire District Council to assess an area of land south west of Hitchin which was being considered for allocation as a strategic site (SWH).

The area surrounding allocation HT2 was defined within area L1 and considered to have 'moderate to high' sensitivity. Despite this relatively high classification, the whole area put forward as site 98 (now known as HT2) was considered to be 'less sensitive'. Justification as to why this is the case was not given within the document. In fact, relatively little justification was made as to the reason or need for this additional classification of 'less sensitive' areas. Despite this lack of justification we presume that the proposed allocation of HT2 was a direct result of this assessment.

The area defined as 'less sensitive' within this document appears to be constrained to the exact site boundaries of the proposed site submission of site 98. We believe this is unjustified as landscape character does not simply stop or end abruptly at a field boundary (unless specifically defined by a landscape feature). We consider that there are additional opportunities for further allocations within this area. Furthermore, there are several areas within the vicinity of HT2 which we believe would be less sensitive to change. Alternative or additional allocations within the area would also help to deliver the much needed housing growth within and around Hitchin.

We believe there has been a lack of assessment of the potential within this area for additional growth.

This may be due to the background of the sites surrounding HT2. The majority of the residual land around HT2 was put forward as a strategic site (SWH) which was dismissed by the Council in 2014 due to the infrastructure requirements which would have been required to deliver a large site (a separate representation is being submitted by DLP in respect of this matter). This site was later fragmented into sections by the promotor. The closest parcels to HT2 being SWHc (which includes part of the land subject put forward as an alternative within this representation) and SWHd. These split sites were not carried forward into the draft plan due to fragmented ownership and questions over deliverability. We wish to promote an alternative site which represents part of site SWHc and site 220 being considered as a whole which we believe can overcome the previous concerns which led to them being not considered for allocation.

To illustrate this in more detail we refer your attention to the accompanying alternative site appraisal document which is submitted alongside this representation.

*(Continue on a separate sheet if necessary)*

NORTH HERTFORDSHIRE  
DISTRICT COUNCIL



6. Please set out what modification (s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified at question 5 above where this relates to soundness. (NB Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

We wish to seek an alternative/additional allocation policy for land at Mill Lane/London Road and consider that further work should be undertaken to assess the potential of additional development within this area.

(Continue on a separate sheet if necessary)

**Please note** your representation should cover concisely all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

**After this stage, further submissions will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

**No**, I do not wish to participate at the oral examination.

**Yes**, I wish to participate at the oral examination

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

To continue to debate the justification for allocation HT2 over and above other locations for development within the area.

**Please note** the inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

9. Do you wish to be notified when the Local Plan is submitted?

**Yes**, I do wish to be notified

**No**, I do not wish to be notified

10. Signature:

A handwritten signature in black ink, appearing to read 'Hayle', written inside a rectangular box.

Date:

28/11/2016